

EXHIBIT D

From: Jared Hartzman
Sent: Friday, June 30, 2023 3:40 PM
To: headwater@raklaw.com
Cc: [SERVICE FR] Samsung-Headwater
Subject: Headwater v. Samsung Case No. 2:22-cv-422: Intent to Supplement Contentions

Counsel:

In relation to the today-supplemental response to Plaintiff's interrogatory No. 1, Samsung has diligently pursued third party discovery and we notify you that Defendant Samsung intends to supplement its Invalidity Contentions with third party content specified in that supplemental response.

For purposes of notice and status as to third party discovery, Samsung expects to receive additional third party discovery responses in the coming weeks and may well further supplement its interrogatory No. 1 as well as its Invalidity Contentions with additional documents and things obtained as a result of that discovery.

Regards,

Jared